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*ACE American Insurance Company*

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

FABIAN SALAZAR, individually,  
 Plaintiff,

v.

ACE AMERICAN INSURANCE COMPANY, a  
 Foreign Corporation; DOES 1 through 10; ROE  
 BUSNIESS ENTITIES 1 through 10, inclusive  
 Defendants.

CASE NO.: 2:23-cv-00450-RFB-EJY

**STIPULATION AND ORDER TO  
 EXTEND TIME TO FILE RESPONSE  
 TO PLAINTIFF'S COMPLAINT**

**(First Request)**

Defendant ACE American Insurance Company ("ACE") and Plaintiff Fabian Salazar, by and through their attorneys, hereby stipulate and request that the Court extend time to respond to Plaintiff's Complaint. The parties have stipulated to extend the response deadline to **April 7, 2023**.

ACE filed its Notice of Removal (ECF No. 1) on March 24, 2023. Because no defendant had yet filed an answer or other response to Plaintiff's complaint when ACE removed the case, Defendants' current deadline to answer or otherwise respond is March 31, 2023, seven days after removal, under Fed. R. Civ. P. 81(c)(2)(C). This stipulation extends Defendant's deadline to respond by 7 days, through and including April 7, 2023. This is the parties' first stipulation to extend Defendant's deadline to respond to Plaintiff's complaint.

Respectfully Submitted,

Dated: March 30, 2023

MARZOLA & RUIZ LAW GROUP PLLC

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/s/ Yvonne Ruiz

/s/ Dylan Todd

YVONNE RUIZ, ESQ.

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**ORDER**

IT IS HEREBY ORDERED that the parties' Stipulation for Extension of Time to extend the time for ACE to file a response to Plaintiff's Complaint on or before **April 7, 2023** is granted.

  
UNITED STATES MAGISTRATE JUDGE

DATED: March 30, 2023